

## **EXHIBIT L**

**Excerpts from September 20, 2019 deposition of  
Easter Seal New Hampshire's 30(b)(6) corporate  
representative, Jay A. Hoyt**

**PUBLIC REDACTED VERSION**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
NO. 2:10-cv-0106-LRH-VCF

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ORACLE USA, INC.; a Colorado corporation; ORACLE )  
AMERICA, INC.; a Delaware corporation; and ORACLE )  
INTERNATIONAL CORPORATION, a California )  
corporation, )  
Plaintiffs, )  
vs. )  
RIMINI STREET, INC., a Nevada corporation; )  
and SETH RAVIN, an individual, )  
Defendants. )

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HIGHLY CONFIDENTIAL -- ATTORNEYS' EYES ONLY  
VIDEOTAPED DEPOSITION OF EASTER  
SEALS OF NEW HAMPSHIRE BY JAY A. HOYT, called as a  
witness by and on behalf of the Plaintiffs,  
pursuant to the applicable provisions of the  
Federal Rules of Civil Procedure, Rule 30(b)(6),  
before P. Jodi Ohnemus, RPR, RMR, CRR, CA-CSR  
#13192, NH-CSR #91, and MA-CSR #123193, at Sheehan  
Phinney Bass & Green, 1000 Elm Street, Manchester,  
New Hampshire, on Friday, September 20, 2019,  
commencing at 9:21 a.m.

PAGES: 1-67

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<p>1 A. We moved to another system. 09:39:50</p> <p>2 Q. What system was that? 09:39:51</p> <p>3 A. DayForce by Ceridian. 09:39:55</p> <p>4 Q. Does Rimini provide updates for the 09:39:57</p> <p>5 DayForce system? 09:39:59</p> <p>6 A. No. 09:40:00</p> <p>7 Q. Why did you decide to switch? 09:40:04</p> <p>8 A. PeopleSoft is old. 09:40:09</p> <p>9 Q. Were you still able to receive updates for 09:40:14</p> <p>10 the PeopleSoft system that you had in April of 2018 09:40:16</p> <p>11 -- PeopleSoft HR? 09:40:18</p> <p>12 A. Yes. 09:40:20</p> <p>13 Q. Aside from being old, was there anything 09:40:23</p> <p>14 particular that PeopleSoft HR -- how it wasn't 09:40:25</p> <p>15 meeting your needs? 09:40:28</p> <p>16 A. Yes. 09:40:35</p> <p>17 Q. And what was that? 09:40:35</p> <p>18 A. It's -- well, because of its age, it 09:40:40</p> <p>19 doesn't have the capabilities of a -- a modern 09:40:44</p> <p>20 system; it was installed in-house; we didn't want 09:40:48</p> <p>21 to maintain the software inside of our own 09:40:52</p> <p>22 environment. 09:40:56</p> <p>23 Q. What were the challenges with maintaining 09:40:59</p> <p>24 the software? 09:41:00</p> <p>25 A. It's just time, it's -- and effort of 09:41:03</p> <p style="text-align: right;">Page 18</p>	<p>1 [REDACTED] [REDACTED]</p> <p>2 Q. Do you know where your update would have 09:42:16</p> <p>3 been posted? 09:42:17</p> <p>4 A. In the cloud based. 09:42:18</p> <p>5 Q. And am I correct that you did not collect 09:42:23</p> <p>6 materials from the cloud server? 09:42:26</p> <p>7 A. That's true. 09:42:27</p> <p>8 Q. Do you consider that to be your system? 09:42:28</p> <p>9 A. We provision it. 09:42:31</p> <p>10 Q. What does that mean? 09:42:34</p> <p>11 A. We purchase the system. 09:42:36</p> <p>12 Q. Did you purchase the physical hardware? 09:42:41</p> <p>13 A. No. 09:42:42</p> <p>14 Q. Well, what did you -- what did you 09:42:46</p> <p>15 purchase, then? 09:42:48</p> <p>16 A. Service. 09:42:49</p> <p>17 Q. Okay. From whom? 09:42:49</p> <p>18 A. Windstream. 09:42:50</p> <p>19 Q. So going back then, because you purchased 09:42:58</p> <p>20 it, do you consider it to be your system? 09:43:00</p> <p>21 A. Yes. 09:43:09</p> <p>22 Q. All right. If asked, will you collect 09:43:12</p> <p>23 documents from that system? 09:43:15</p> <p>24 A. No. 09:43:15</p> <p>25 Q. Why not? 09:43:16</p> <p style="text-align: right;">Page 20</p>
<p>1 staff. 09:41:06</p> <p>2 Q. Was cost a consideration? 09:41:09</p> <p>3 A. No. 09:41:12</p> <p>4 Q. Looking back at the document at 9402, who 09:41:15</p> <p>5 is Christopher R. Dunn, if you know? 09:41:22</p> <p>6 A. I don't. 09:41:24</p> <p>7 MS. CARRIER: Sorry -- for clarification: 09:41:27</p> <p>8 Christopher Dunn works at my office. He just 09:41:28</p> <p>9 printed these documents. 09:41:30</p> <p>10 MR. MINNE: Okay. 09:41:33</p> <p>11 Q. Other than the author or printer at the 09:41:33</p> <p>12 top, does the information in the header look 09:41:37</p> <p>13 correct? 09:41:42</p> <p>14 A. Yes. 09:41:43</p> <p>15 Q. Is there any reason to believe that it 09:41:43</p> <p>16 would have been changed since you received it? 09:41:45</p> <p>17 A. No. 09:41:47</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p> <p style="text-align: right;">Page 19</p>	<p>1 A. We don't need it. 09:43:19</p> <p>2 Q. In the context of responding to this 09:43:22</p> <p>3 subpoena in this matter that calls for support 09:43:24</p> <p>4 documents from your systems, is there a reason you 09:43:26</p> <p>5 wouldn't collect it? 09:43:30</p> <p>6 A. Again, we wouldn't need it. 09:43:32</p> <p>7 Q. Okay. So turning back to -- I believe 09:43:53</p> <p>8 it's Exhibit 1802, Schedule A. 09:43:55</p> <p>9 A. (Witness reviews document.) 09:43:55</p> <p>10 Q. So item "b" calls for "All documents and 09:44:22</p> <p>11 communications concerning any Oracle software and 09:44:26</p> <p>12 support materials that have been copied to or 09:44:29</p> <p>13 stored on your systems by Rimini on or after August 09:44:31</p> <p>14 15th, 2018," and it goes on. 09:44:35</p> <p>15 So -- so do you consider the updates to be 09:44:40</p> <p>16 responsive to this request or not? 09:44:44</p> <p>17 A. I don't. 09:44:48</p> <p>18 Q. Okay. And why not? 09:44:49</p> <p>19 A. Again, because we don't -- we didn't use 09:44:51</p> <p>20 them. 09:44:53</p> <p>21 Q. So I guess I'm wondering, because you 09:44:56</p> <p>22 didn't use them, do you not consider Windstream to 09:45:00</p> <p>23 be your system? 09:45:02</p> <p>24 A. In that context, no. 09:45:04</p> <p>25 Q. Okay. When was the last time you used 09:45:08</p> <p style="text-align: right;">Page 21</p>

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<p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 Q. Do you know whether Easter Seals continues 09:52:34</p> <p>19 to pay for the Windstream environment? 09:52:36</p> <p>20 A. Yes. 09:52:40</p> <p>21 Q. And does Easter Seals continue to pay for 09:52:43</p> <p>22 the Windstream environment? 09:52:45</p> <p>23 A. Yes. 09:52:46</p> <p>24 Q. Do you know about how much they pay? 09:52:47</p> <p>25 A. Yes. 09:52:49</p> <p style="text-align: right;">Page 26</p>	<p>1 Q. And you don't use PeopleSoft HR; correct? 09:54:21</p> <p>2 A. That's correct. 09:54:24</p> <p>3 Q. And you don't need updates for PeopleSoft 09:54:26</p> <p>4 HR; correct? 09:54:28</p> <p>5 A. That's correct. 09:54:29</p> <p>6 Q. In addition to the printed-out version of 09:54:50</p> <p>7 these files that you have, do you know whether 09:54:52</p> <p>8 these files were also collected and produced in 09:54:53</p> <p>9 native version? 09:54:56</p> <p>10 A. I don't understand the question. 09:54:59</p> <p>11 Q. Did you have to collect these files twice? 09:55:07</p> <p>12 A. No. 09:55:11</p> <p>13 Q. Okay. I'll represent to you that, in 09:55:13</p> <p>14 addition to receiving a PDF with all of these 09:55:16</p> <p>15 files, we also received native version copies of 09:55:18</p> <p>16 these files. 09:55:20</p> <p>17 Does that make sense? 09:55:22</p> <p>18 A. Yes. 09:55:23</p> <p>19 Q. Okay. 09:55:23</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p> <p style="text-align: right;">Page 28</p>
<p>1 Q. How much is that? 09:52:50</p> <p>2 A. Approximately \$1,100 a year. 09:52:52</p> <p>3 Q. Do you know why Easter Seals continued to 09:53:01</p> <p>4 pay for the environment when it no longer uses that 09:53:03</p> <p>5 environment for support? 09:53:05</p> <p>6 A. Could you repeat that? 09:53:09</p> <p>7 MR. MINNE: Could you read back the 09:53:11</p> <p>8 question. 09:53:12</p> <p>9 (Question read back.) 09:53:12</p> <p>10 A. I do. 09:53:26</p> <p>11 Q. And why is that? 09:53:27</p> <p>12 A. The environment is for testing any update 09:53:31</p> <p>13 that we might potentially need from a support 09:53:38</p> <p>14 perspective. 09:53:41</p> <p>15 Q. Does that include any updates to 09:53:46</p> <p>16 PeopleSoft Financials? 09:53:49</p> <p>17 A. Yes. 09:53:51</p> <p>18 Q. Do you currently receive updates to 09:53:55</p> <p>19 PeopleSoft Financials from Rimini? 09:53:57</p> <p>20 A. We received one. 09:53:59</p> <p>21 Q. Which update was that? 09:54:01</p> <p>22 A. That was the attachment with the zip file. 09:54:02</p> <p>23 Q. Okay. But you no longer receive updates 09:54:12</p> <p>24 for PeopleSoft HR; correct? 09:54:13</p> <p>25 A. We no longer retrieve them. 09:54:17</p> <p style="text-align: right;">Page 27</p>	<p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p> <p style="text-align: right;">Page 29</p>

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12 MR. THOMAS: Counsel, just one question -- 10:41:06  
 13 housekeeping: This is an exhibit number from 10:41:09  
 14 another case. 10:41:13  
 15 MR. MINNE: That's correct, yes. 10:41:16  
 16 MR. THOMAS: Do you think it's a good idea 10:41:18  
 17 to continue using exhibits from another case? 10:41:19  
 18 Given numbers, I mean. 10:41:22  
 19 MR. MINNE: I've got no objection if we 10:41:23  
 20 want to further mark it. 10:41:28  
 21 MR. THOMAS: I think it might be a good 10:41:30  
 22 idea, because otherwise we may have a 121 in this 10:41:31  
 23 case. 10:41:35  
 24 MR. MINNE: Yeah. That's -- that's fair. 10:41:36  
 25 Sure. 10:41:36

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1 Let's mark it 1809 -- sorry, the 10:41:36  
 2 previously marked Exhibit 121 will be marked 1809. 10:41:38  
 3 (Exhibit 1809, EASTERSEALSNH2-SUB 10:41:49  
 4 000007844-848.) 10:41:53  
 5 Q. You testified previously -- 10:42:15  
 6 MR. MINNE: Is the court reporter ready? 10:42:19  
 7 COURT REPORTER: I'm ready. 10:42:20  
 8 Q. You testified previously that Easter Seals 10:42:22  
 9 paid approximately \$1,100 for this Windstream 10:42:24  
 10 environment; correct? 10:42:27  
 11 A. Yes. 10:42:28

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6 Q. Do you know if Easter Seals has a license 10:43:41  
 7 for any COBOL compiler? 10:43:44  
 8 A. I don't believe so. 10:43:47  
 9 Q. Do you know if Easter Seals previously had 10:43:52  
 10 a license for a COBOL compiler? 10:43:53  
 11 MR. THOMAS: Objection. Outside the scope 10:43:56  
 12 to the extent... 10:43:56  
 13 (Court Reporter comment.) 10:43:56  
 14 MR. THOMAS: Outside the scope of the 10:43:56  
 15 subpoena to the extent it's outside the time frame 10:44:01  
 16 for the subpoena. 10:44:03  
 17 A. I -- I don't know. Possibly. 10:44:08

23 MR. MINNE: Okay. Those are the questions 10:44:33  
 24 I have at this time. I'll note that there were 10:44:34  
 25 several documents referenced that we had not 10:44:36

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1 received, and to the extent those are -- we would 10:44:38  
 2 request those documents be produced and reserve all 10:44:42  
 3 rights to continue the deposition regarding those 10:44:48  
 4 documents. 10:44:51  
 5 MR. THOMAS: Let's go off the record for a 10:44:52  
 6 minute. 10:44:53  
 7 VIDEO OPERATOR: The time is 10:45, and we 10:44:54  
 8 are now off the record. 10:44:56  
 9 (Recess was taken.) 10:44:56  
 10 VIDEO OPERATOR: The time is 10:49, and we 10:49:22  
 11 are now back on the record. 10:49:25  
 12 EXAMINATION 10:49:25  
 13 BY MR. THOMAS: 10:49:25  
 14 Q. Good morning, sir. My name's Jeff Thomas, 10:49:27  
 15 and I represent Rimini Street. Thanks for your 10:49:30  
 16 time here today. 10:49:32  
 17 Now, you've explained to us that you are 10:49:36  
 18 no longer retrieving the PeopleSoft HR updates 10:49:38  
 19 because you don't -- you no longer use that system; 10:49:42  
 20 correct? 10:49:45  
 21 A. That's true. 10:49:46  
 22 Q. Okay. But you still want and have 10:49:47  
 23 contracted for Rimini to provide updates to the 10:49:51  
 24 environment on -- in the cloud. 10:49:55  
 25 A. For PeopleSoft Financials. 10:50:00

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<p>1 Q. Okay. But are you -- do you know whether 10:50:04</p> <p>2 Rimini is, in fact, still downloading updates to 10:50:08</p> <p>3 PeopleSoft HR in the environment? 10:50:13</p> <p>4 MR. MINNE: Objection. Lacks foundation. 10:50:17</p> <p>5 A. I -- I don't know. 10:50:19</p> <p>6 Q. Do you know whether you still have a 10:50:21</p> <p>7 contract with Rimini and are paying Rimini to 10:50:24</p> <p>8 provide those PeopleSoft HR updates? 10:50:28</p> <p>9 A. We are. 10:50:31</p> <p>10 MR. MINNE: Same objection. 10:50:32</p> <p>11 Q. You are. 10:50:33</p> <p>12 A. We are. 10:50:33</p> <p>13 Q. Okay. So that's something that Easter 10:50:34</p> <p>14 Seals wants Rimini to do; correct? 10:50:36</p> <p>15 A. Yes. 10:50:38</p> <p>16 MR. MINNE: Could you give me a second to 10:50:43</p> <p>17 interpose an objection before you answer. 10:50:44</p> <p>18 THE WITNESS: Okay. 10:50:46</p> <p>19 Q. So is it -- is it true that Easter Seals 10:50:47</p> <p>20 has made the decision that, although it no longer 10:50:50</p> <p>21 uses PeopleSoft HR, it wants Rimini to continue to 10:50:56</p> <p>22 provide updates for that system in the cloud 10:51:02</p> <p>23 environment? 10:51:06</p> <p>24 MR. MINNE: Objection. Lacks foundation. 10:51:07</p> <p>25 A. Yes. 10:51:11</p> <p style="text-align: right;">Page 54</p>	<p>1 A. I'm going to say probably. 10:52:32</p> <p>2 Q. And in terms of retrieving any updates -- 10:52:35</p> <p>3 for example, for PeopleSoft Financial -- that 10:52:41</p> <p>4 Rimini may provide, do you need access to any other 10:52:46</p> <p>5 site other than that FTP site? 10:52:51</p> <p>6 A. No. 10:52:53</p> <p>7 Q. Sir, Counsel showed you previously what 10:53:08</p> <p>8 was marked as Exhibit 1809, which is the email that 10:53:11</p> <p>9 you sent. 10:53:20</p> <p>10 Do you see that? 10:53:21</p> <p>11 A. Yes. 10:53:22</p> <p>12 Q. Okay. I'd just like to ask you a couple 10:53:24</p> <p>13 of followup questions about that. 10:53:25</p> <p>14 MR. THOMAS: I'm going to ask the reporter 10:53:43</p> <p>15 to mark as Exhibit 1810 a document that was 10:53:45</p> <p>16 previously marked in the other lawsuit as Exhibit 10:53:50</p> <p>17 118. 10:53:54</p> <p>18 (Exhibit 1810, Easter Seals 17672-675.) 10:54:05</p> <p>19 MR. MINNE: Counsel, it looks like you're 10:54:19</p> <p>20 introducing into evidence the entire set of 10:54:20</p> <p>21 deposition exhibits? 10:54:23</p> <p>22 MR. WHITTAKER: No, that's just a copy for 10:54:25</p> <p>23 you. 10:54:26</p> <p>24 MR. MINNE: Okay. 10:54:26</p> <p>25 MR. THOMAS: I suggest you use tab 118 as 10:54:28</p> <p style="text-align: right;">Page 56</p>
<p>1 Q. And has Easter Seals ever asked Rimini to 10:51:17</p> <p>2 stop providing those updates? 10:51:21</p> <p>3 A. No. 10:51:23</p> <p>4 Q. Has Easter Seals ever informed Rimini that 10:51:23</p> <p>5 it is no longer using the PeopleSoft HR system? 10:51:28</p> <p>6 MR. MINNE: Objection. Lacks foundation. 10:51:33</p> <p>7 A. Not to my knowledge. 10:51:34</p> <p>8 Q. And I believe you explained that, although 10:51:45</p> <p>9 you no longer use the PeopleSoft HR system, you 10:51:48</p> <p>10 still have that software and the database on your 10:51:50</p> <p>11 system? 10:51:53</p> <p>12 A. We do. 10:51:54</p> <p>13 Q. And that's because you use it for 10:51:56</p> <p>14 reference and other purposes? 10:51:57</p> <p>15 A. That's true. 10:51:59</p> <p>16 Q. Now, you explained to Counsel earlier that 10:52:10</p> <p>17 Easter Seals does not have access to the test 10:52:15</p> <p>18 environment that's maintained in the cloud; 10:52:17</p> <p>19 correct? 10:52:20</p> <p>20 A. That's true. 10:52:20</p> <p>21 Q. But you do have access -- don't you -- to 10:52:21</p> <p>22 the FTP site where you can download the updates 10:52:26</p> <p>23 from? 10:52:28</p> <p>24 MR. MINNE: Objection. Misstates 10:52:29</p> <p>25 testimony. 10:52:30</p> <p style="text-align: right;">Page 55</p>	<p>1 your copy. 10:54:28</p> <p>2 MR. MINNE: Understood. Thank you. 10:54:32</p> <p>3 Q. Sir, do you have that in front of you? 10:54:33</p> <p>4 A. I do. 10:54:35</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 Q. It's true, isn't it, that you were given 10:55:26</p> <p>22 the option to either put your environments on your 10:55:28</p> <p>23 own systems or -- or in the cloud? 10:55:31</p> <p>24 A. That's true. 10:55:36</p> <p>25 Q. And Easter Seals chose the option of 10:55:37</p> <p style="text-align: right;">Page 57</p>

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1 putting your environments in the cloud. 10:55:40  
 2 A. That's true. 10:55:42  
 3 Q. And by doing so you took ownership of your 10:55:43  
 4 -- of those cloud environments; is that true? 10:55:48  
 5 A. Yes, by paying for it. 10:55:52  
 6 MR. THOMAS: Mark as Exhibit -- 10:56:38  
 7 COURT REPORTER: 1811. 10:56:41  
 8 MR. THOMAS: -- 1811 a document that was 10:56:44  
 9 previously marked in the other litigation as 10:56:47  
 10 Exhibit 110, license agreement between PeopleSoft 10:56:49  
 11 and Easter Seals. 10:57:02  
 12 (Exhibit 1811, ORCLRS 0665229-236.) 10:57:08  
 13 Q. Sir, do you see that this is a Software 10:57:22  
 14 License and Services Agreement between PeopleSoft 10:57:28  
 15 and Easter Seals? 10:57:30  
 16 A. Yes. 10:57:33  
 17 MR. MINNE: Objection. Outside the scope. 10:57:33  
 18 Lacks foundation. 10:57:36  
 19 Q. And you see in the very first provision of 10:57:48  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 MR. MINNE: Same objections. 10:58:10  
 25 Q. Do you see that? 10:58:11

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1 A. Yes. 10:58:11  
 2 Q. Are you -- since August 15 of 2018, are 10:58:13  
 3 you aware of Rimini providing any support for 10:58:19  
 4 Easter Seals for any purposes other than your 10:58:25  
 5 internal data processing operations? 10:58:30  
 6 MR. MINNE: Objection. Lacks foundation. 10:58:33  
 7 A. No. 10:58:35  
 8 Q. You mentioned earlier that you are aware 10:59:01  
 9 that Mr. Bonfanti was deposed in other litigation 10:59:03  
 10 between Rimini and Oracle? 10:59:07  
 11 A. Yes. 10:59:11  
 12 Q. Do you have any reason at all to believe 10:59:13  
 13 that any of the testimony that Mr. Bonfanti gave in 10:59:15  
 14 that deposition was inaccurate? 10:59:18  
 15 MR. MINNE: Objection. Lacks foundation. 10:59:21  
 16 A. No. 10:59:22  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

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1 [REDACTED]  
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 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 Q. Sir, since August 15, 2018, to your 11:01:49  
 12 knowledge has Oracle informed Easter Seals that it 11:01:55  
 13 should not continue to use Rimini? 11:02:02  
 14 MR. MINNE: Objection. Beyond the scope. 11:02:06  
 15 A. No. 11:02:07  
 16 Q. Has -- during that same time period, has 11:02:08  
 17 Oracle ever informed Easter Seals that it cannot 11:02:12  
 18 maintain its environments on the cloud? 11:02:17  
 19 MR. MINNE: Objection. Beyond the scope. 11:02:20  
 20 A. No. 11:02:22  
 21 Q. Has anyone ever suggested to you that 11:02:23  
 22 Easter Seals cannot both maintain your environments 11:02:27  
 23 on the cloud and use a third-party support 11:02:31  
 24 provider? 11:02:34  
 25 MR. MINNE: Same objection. 11:02:35


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1 A. No. 11:02:36  
 2 Q. Does that make any sense to you? 11:02:42  
 3 A. I -- I don't -- I don't know. I'm not 11:02:45  
 4 sure of the context. 11:02:48  
 5 Q. Okay. Fair enough. 11:02:50  
 6 MR. THOMAS: No further questions. Thank 11:02:58  
 7 you very much. 11:03:00  
 8 FURTHER EXAMINATION 11:03:00  
 9 BY MR. MINNE: 11:03:04  
 10 Q. Mr. Hoyt, I have just a few more questions 11:03:11  
 11 for you, and then we can finish up. 11:03:13  
 12 A. Okay. 11:03:13  
 13 Q. Turning back to the collection of emails, 11:03:20  
 14 the last page, "Amendment 3." 11:03:22  
 15 MR. THOMAS: What exhibit are we on? 11:03:29  
 16 MS. CARRIER: 1804? 11:03:35  
 17 MR. MINNE: Yes. 11:03:36  
 18 A. Which one? 11:03:36  
 19 Q. It's the last page, Easter Seals 9520. 11:03:37  
 20 It's Exhibit 1804. 11:03:41  
 21 A. Yes. 11:03:48  
 22 Q. You testified earlier that you -- before 11:03:49  
 23 today you haven't seen this document; correct? 11:03:50  
 24 A. I don't believe so. 11:03:52  
 25 Q. And is it also correct that you're not 11:03:54

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## HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

1	MR. MINNE: Ycs.	11:08:34
2	VIDEO OPERATOR: Does that go for the	11:08:37
3	video as well?	11:08:38
4	MR. MINNE: Yeah.	11:08:41
5	COURT REPORTER: Three days for your final	
6	transcript?	
7	I did get word of that.	
8	MR. WHITTAKER: You did? Then, yeah.	
9	That's what they've ordered.	
10	MR. MINNE: Yeah, and if we can get roughs	
11	as soon as possible.	
12	COURT REPORTER: And does three days work	
13	for you?	
14	MR. MINNE: Fine.	
15	(Whereupon the deposition recessed at	
16	11:08 a.m.)	
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